

**EXHIBIT 128**  
**Unredacted Version of**  
**Document Sought to be Sealed**

CONFIDENTIAL

July 22, 2022

VIA ELECTRONIC MAIL

Lesley Weaver  
Bleichmar Fonti & Auld LLP  
555 12th Street, Suite 1600  
Oakland, CA 94607

Derek W. Loeser  
Keller Rohrbach L.L.P.  
1201 Third Avenue, Suite 3200  
Seattle, WA 98101

Re: In re Facebook, Inc. Consumer Privacy User Profile Litigation (N.D. Cal.), Case No. 3:18-md-02843-VC

Dear Counsel:

This letter summarizes our discussions during meet and confers regarding Facebook's collection from the following document sources: Quips, Wikis, Tasks, and Workplace Groups. As we have also discussed, if Plaintiffs identify hyperlinks for these document sources in produced materials, and determine that materials associated with these hyperlinks have not been produced, Facebook is willing to conduct a reasonable investigation into any such hyperlinks.

**Quips.** Quips were collected from the Quip system based on a reasonable and diligent investigation conducted by counsel which included the collection of Quip accounts for document custodians who identified Quips as a potentially relevant data source, as well as targeted searches of the Quip system based on interviews with knowledgeable persons.

**Tasks.** Tasks were collected based on a reasonable and diligent investigation conducted by counsel which included the collection of Tasks through email for document custodians who indicated that Tasks were linked to their Facebook email accounts, from the Tasks system for custodians who indicated that Tasks were not linked to their Facebook email accounts, and through targeted searches of the Tasks system based on interviews with knowledgeable persons.

July 22, 2022

Page 2

**Wikis.** Wikis were collected from the Wiki system based on a reasonable and diligent investigation conducted by counsel which included the collection of Wikis for document custodians who identified Wikis as a potentially relevant data source, as well as targeted searches of the Wiki system based on interviews with knowledgeable persons.

**Workplace Groups.** Groups were collected from the Workplace system based on a reasonable and diligent investigation performed by counsel which included the collection of Groups identified as being potentially relevant by document custodians, as well as targeted searches of the Workplace system based on interviews with knowledgeable persons.

Please don't hesitate to call me if you have any questions.

Sincerely,

/s/ Rosemarie T. Ring

Rosemarie T. Ring

RTR/acm

cc: Counsel of record